

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

WHITNEY MAIN, HENRY SCHMIDT and
DANIEL GRENTZ, individually and as
representatives of a class of similarly situated
persons, and on behalf of the American
Airlines, Inc., 401(k) Plan,

Plaintiffs,

V.

AMERICAN AIRLINES INC., PENSION
ASSET ADMINISTRATION COMMITTEE,
BENEFITS STRATEGY COMMITTEE,
PENSION BENEFITS ADMINISTRATION
COMMITTEE, EMPLOYEE BENEFITS
COMMITTEE, AND JOHN DOES 1-90,

Defendants.

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Case No. 3:16-cv-01033-C

ORAL ARGUMENT REQUESTED

DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Defendants American Airlines, Inc., the Pension Asset Administration Committee, the Benefits Strategy Committee, the Pension Benefits Administration Committee, and the Employee Benefits Committee, respectfully move the Court to dismiss the class action complaint filed by Plaintiffs Whitney Main, Henry Schmidt, and Daniel Gretzn (the “Complaint”). For the reasons stated in the accompanying Memorandum in Support of Defendants’ Motion to Dismiss the Complaint, the Complaint should be dismissed entirely and with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6) because Plaintiffs fail to state a claim under the Employee Retirement Income Security Act of 1974 (“ERISA”).

WHEREFORE, Defendants respectfully request dismissal of the Complaint.

Respectfully submitted,

Dated: June 10, 2016

/s/ Lars L. Berg
Dee J. Kelly, Jr. (S.B. # 11217250)
Lars L. Berg (S.B. # 00787072)
KELLY HART & HALLMAN LLP
201 Main Street, Suite 2500
Fort Worth, Texas 76102
Tel.: (817) 332-2500
Fax: (817) 878-9280
dee.kelly.2@kellyhart.com
lars.berg@kellyhart.com

Brian D. Boyle (*pro hac vice pending*)
(D.C. Bar # 419773)
Shannon M. Barrett (*pro hac vice pending*)
(D.C. Bar # 476866)
Meaghan VerGow (*pro hac vice pending*)
(D.C. Bar # 977165)
O'MELVENY & MYERS LLP
1625 Eye Street, N.W.
Washington, D.C. 20006
Tel.: (202) 383-5300
Fax: (202) 383-5300
bboyle@omm.com
sbarrett@omm.com
mvergow@omm.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

On June 10, 2016, a true and correct copy of the foregoing document was served upon all persons who have requested notice and service of pleadings in this case via the Court's CM/ECF system.

/s/ Lars L. Berg
Lars L. Berg